

UNITED STATES DISTRICT COURT
for the
Eastern District of Michigan

United States of America

v.

Gjuan Williams

Case No. 2:25-mj-30236

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of January 31, 2022 in the county of Wayne in the
Eastern District of Michigan, the defendant(s) violated:

Code Section
18 U.S.C. § 922(g)(1)

Offense Description
Felon in possession of a firearm

This criminal complaint is based on these facts:
see attached affidavit.

☒ Continued on the attached sheet.

Sworn to before me and signed in my presence
and/or by reliable electronic means.

Date: April 15, 2025

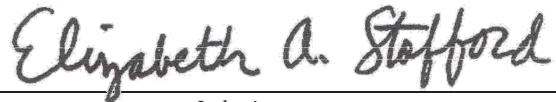
City and state: Detroit, MI



Complainant's signature

Brent Smith, Special Agent

Printed name and title



Judge's signature

Hon. Elizabeth A. Stafford, U.S. Magistrate Judge

Printed name and title

AFFIDAVIT

I, Brendt Smith being duly sworn, depose and state the following:

INTRODUCTION

1. I have been employed as a Special Agent (SA) with the Bureau of Alcohol, Tobacco, Firearms, and Explosives (ATF) since January 2022. I am currently assigned to the Detroit, Michigan, Field Division, Group II. In this role, I investigate violations of firearms, arson, fraud, explosives, and narcotics laws. Prior to my employment with ATF, I was employed by United States Customs and Border Protection (CBP), Office of Field Operations, for approximately eight years in the position of federal officer. Prior to my employment with CBP, I was employed by the City of Saint Clair for approximately seven years in the position of police officer.

2. I have an associate degree in Criminal Justice from Saint Clair County Community College. I graduated from the Kirtland Regional Police Academy and completed the CBP Field Operations Academy, Criminal Investigator Training Program and Special Agent Basic Training at the Federal Law Enforcement Training Center.

3. I make this affidavit from personal knowledge based on my participation in this investigation, as well as information received from other law enforcement officers and/or their reports and records. The information outlined herein is provided for the limited purpose of establishing probable cause and does

not contain all details or facts that exist pertaining to the investigation. As set forth below, probable cause exists that Gjuan WILLIAMS (B/M, DOB: XX/XX/1989) violated 18 U.S.C. § 922(g)(1) (felon in possession of a firearm) on or about January 31, 2022.

CRIMINAL HISTORY FOR WILLIAMS

4. I reviewed WILLIAMS' computerized criminal history (CCH) and learned that in 2007, WILLIAMS was convicted of armed robbery in the 6th Circuit Court in Michigan.

5. On September 29, 2016, WILLIAMS was paroled after serving over a year in prison for his 2007 armed robbery conviction. Because WILLIAMS has served time in prison, and I know the Michigan Department of Corrections notifies persons they are prohibited from possessing firearms on release from prison, WILLIAMS is therefore likely aware of his status as a convicted felon who is prohibited from possessing firearms. WILLIAMS also admitted to knowing he cannot possess firearms during a law enforcement interview, as later described below.

PROBABLE CAUSE

6. On January 31, 2022, the Canton Police Department (CPD) investigated a stolen vehicle report involving WILLIAMS. The victim (V1) identified their stolen vehicle's location based on information V1 received from

their secondary GPS device. CPD responded to the location provided by V1 and located V1's stolen vehicle parked on the street in the location V1 provided. CPD established surveillance on the stolen vehicle and observed a person, later identified as WILLIAMS, exit a house and enter the stolen vehicle's driver seat. CPD followed WILLIAMS to a gas station in Detroit, MI. Williams exited the vehicle and began walking towards the gas station when CPD placed WILLIAMS under arrest for possessing a stolen vehicle. During the arrest, WILLIAMS admitted he had a firearm in the vehicle. During a search of the vehicle, CPD located an M+M, Model M10-762, 7.62 caliber pistol, bearing serial number DF385020ROA on the front passenger floor. During a post-*Miranda* interview, WILLIAMS admitted to possessing the stolen vehicle and the firearm. During the interview, WILLIAMS said, "I got caught with a gun, a gun I shouldn't be in possession of." WILLIAMS further stated, "Living in Detroit man, I'm going to tell you something, I don't give no fucks bro about I get caught with it every time before I ride around Detroit without one."

6. ATF Interstate Nexus Expert, Special Agent Joshua McLean was provided with a description and photographs of the M+M, M10-762, pistol recovered from the vehicle WILLIAMS was driving. Based on SA McLean's training and experience with firearms' interstate nexus and SA McLean's examination of the firearm characteristics, SA McLean concluded the firearm was

not manufactured in the State of Michigan. Therefore, probable cause exists that the firearm possessed by WILLIAMS traveled in and affected interstate or foreign commerce.

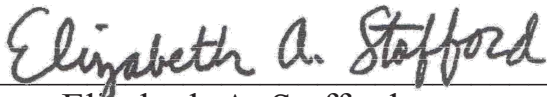
CONCLUSION

7. Probable cause exists to believe that Gjuan WILLIAMS, having been previously convicted of at least one felony, did knowingly possess a firearm, specifically, a black M+M, Model M10-762, 7.62 caliber pistol, bearing serial number DF385020ROA - that had previously traveled in and affected interstate commerce, in violation of Title 18, United States Code, Section 922(g)(1).



Brendt Smith, Special Agent
Bureau of Alcohol, Tobacco, Firearms and
Explosives

Sworn to before me and signed in my presence
And/or by reliable electronic means



Hon. Elizabeth A. Stafford
United States Magistrate Judge

Dated: April 15, 2025